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IN THE DISTRICT COURT OF THE UNITED STATES  
DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION

MAR 22 2011

LARRY W. PROPES, CLERK  
FLORENCE, SC

UNITED STATES OF AMERICA

vs.

**TIMOTHY TYRONE ALEXANDER,**

a/k/a Skeet,

**AMONDO TORAIL BENNETT,**

a/k/a Mondo,

**ANTHONY CURTIS BULLOCK,**

a/k/a Dirty,

**TRAVIS DEMONT CLARK,**

**SHAWN JERMAINE DAVIS, a/k/a Big Boy,**

**MARCUS LEKELL GAINAY, a/k/a Rico,**

**JEROME HENRY,**

**TARRIN ANTUNE HORNE, a/k/a Lil T,**

**PHILLIP LEE LITTLE, a/k/a Lil Phil,**

**RAYMOND JAMES MERCADO,**

a/k/a Whiteboy,

**JEREMY LEE PRATT, a/k/a Candyman,**

**ANTRAWN DEMEZ STURDIVANT,**

a/k/a Trawn, and

**KENNETH THOMAS WILLOUGHBY,**

a/k/a Black

) CRIMINAL NO.: **4:11-CR-416**

) 21 U.S.C. § 846

) 21 U.S.C. § 841(b)(1)(A)

) 21 U.S.C. § 841(b)(1)(C)

**INDICTMENT**

**COUNT 1**

**THE GRAND JURY CHARGES:**

That beginning in or around January 1995, and continuing thereafter, up to and including the date of this Indictment, in the District of South Carolina and elsewhere, the defendants, **TIMOTHY TYRONE ALEXANDER, a/k/a Skeet, AMONDO TORAIL BENNETT, a/k/a Mondo, ANTHONY CURTIS BULLOCK, a/k/a Dirty, TRAVIS DEMONT CLARK, SHAWN JERMAINE DAVIS, a/k/a Big Boy, MARCUS LEKELL GAINAY, a/k/a Rico, JEROME HENRY, TARRIN ANTUNE HORNE, a/k/a Lil T, PHILLIP LEE LITTLE, a/k/a Lil Phil,**

**RAYMOND JAMES MERCADO, a/k/a Whiteboy, JEREMY LEE PRATT, a/k/a Candyman, ANTRAWN DEMEZ STURDIVANT, a/k/a Trawn, and KENNETH THOMAS WILLOUGHBY, a/k/a Black**, knowingly and intentionally did combine, conspire, agree and have tacit understanding with each other and with others, both known and unknown to the grand jury, to knowingly, intentionally and unlawfully possess with intent to distribute and distribute cocaine and cocaine base (commonly known as "crack" cocaine), both Schedule II controlled substances, and marijuana and 3,4-Methylenedioxymethamphetamine (commonly known as "Ecstasy" or "MDMA"), both Schedule I controlled substances, said conspiracy involving 5 kilograms or more of cocaine, 280 grams or more of "crack" cocaine, 50 kilograms or more of marijuana, and a quantity of 3,4-Methylenedioxymethamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 841(b)(1)(C);

All in violation of Title 21, United States Code, Section 846.

A True BILL

[REDACTED] [REDACTED]  
FOREPERSON

WILLIAM N. NETTLES (AWB)  
UNITED STATES ATTORNEY